



Ofcom Consultation

Accreditation Scheme for Price Calculators – A Review of the Scheme

BT response

Summary

BT welcomes this consultation, and the opportunity to respond. We fully support the concept of Ofcom's Price Comparison Website Accreditation Scheme, and believe it provides valuable benefits to both consumers and CPs. We think it is vital that all Price Comparison Websites (PCWs) should ensure information provided is fully transparent and clear, and written in plain English, so that comparisons between CPs are easy. It is also important that consumers can establish quickly what is included or excluded in packages, so they can see what they are paying for.

Q1 Do you agree with Ofcom's conclusions that there is no need for a fundamental revision of the Scheme at this time?

We agree.

Q2 Ofcom is proposing to revise the approval requirements with respect to the provision of information on Quality of Service metrics. Are there other aspects of the scope of the Scheme that we should revise?

No, although the required broadband speeds information needs to be defined explicitly, and needs to reflect the latest Ofcom broadband speed/performance report. (Download) speed (both peak time and 24 hour is required) is just one of several factors important to consumers when assessing a broadband service's overall capabilities.

We also think PCW owners must be clear about their ownership, and they do not misrepresent their independence. It is also important that they are clear about suppliers who have paid for prominence.

Q3 Ofcom is proposing to revise five areas around the operation of the Scheme. Are there any other aspects that we should revise?

No, although some areas proposed could be expanded.

Prices are provided for the key elements of the service (e.g. for mobile contracts, the cost of the handset is recovered over the duration of the contract, and the price typically covers call minutes, texts and data usage), but other key aspects are not included. For example, it is now common for

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charges to be applied for paper billing, itemised billing, late payment charges, payment processing fees and the like. PCWs tend to focus on core charges (i.e. the advertised price), but these additional charges, in particular for fixed and mobile voice, would give customers the complete picture and the full package of what they might be expected to pay.

For call packages, it is also important for consumers to know which calls are included or excluded. For broadband, some CPs may provide additional benefits such as free parental controls, and anti-virus protection. It is important customers know what is included/excluded in the headline prices of the package they are considering. There also needs to be transparency on in-contract price increases, so that the policy is clear.

As part of the service 'wrap' or specification, we think it would help to include any compensation arrangements a CP puts in place for faults, repair, poor service and late provision. This would allow prospective customers to assess what arrangements apply for each CP should things go wrong. Also, it would be useful for consumers to be aware if CPs offer a free (0800) or chargeable help or repair line, and the opening hours and call charges (if applicable) for these lines.

This would lead to more transparency and accuracy. Ofcom, the OFT, Consumer Focus and the European Commission all agree that rankings are based on "full price" – and we believe that these additional charges should be factored in (or the customer has the option to include/exclude).

[Q4 Ofcom is proposing to include a requirement in the approval criteria that PCWs include in their results pages for broadband comparisons clear messaging on speeds, and provide information about Ofcom's comparative information and about online speed checkers. Do you agree with these proposals and our analysis of their impact? Please give reasons and if appropriate state alternatives.](#)

We strongly support this proposal (options 2, 3 and 4 together), but there needs to be greater clarity and breadth, particularly on broadband speed comparisons.

The metrics that are important for a customer to gain a view of the total broadband experience are download speed, upload speed (peak and 24 hour for both), latency, jitter, packet loss and DNS resolution. For the last four, it may be that Ofcom has researched how these Quality of Experience metrics might best be presented in a more consumer-friendly, activity-led manner by the PCWs. We would encourage Ofcom to involve industry as well as consumer representatives in arriving at any proposals.

Ofcom's work on broadband speeds has been of great value to consumers, and the increase in average speeds, particularly with the advent of superfast broadband, has been noticeable in recent years. It is important therefore that speed information appears in the results pages, not on general/background information pages.

We also think consumers would value greatly any 'reliability' data that can be provided, and performance of commonly-used applications (e.g. iPlayer, YouTube, gaming, music downloads). We appreciate, however, the difficulties in objectively defining these factors in a way that is also meaningful to consumers.

This requirement should extend to mobile broadband speeds (3G/4G) which Ofcom has indicated it will measure later in 2013, and publish results in 2014 (although BT would prefer this to be sooner). This will allow consumers to make well-informed buying or switching decisions.

We agree it would be helpful for consumers to have information about online speed checkers, but suggest Ofcom asks for views from industry on which ones. We are not convinced about the benefits of directing consumers to online speed checkers, as they will only be able to check their existing service. However any that are used should have a universally agreed robust methodology.

Finally it would be helpful for prospective customers to know if a CP has signed up to Ofcom's Broadband Speed Code of Practice and to the Industry's Codes of Practice on Traffic Management Transparency and Open Internet.

[Q5 Ofcom is proposing to amend the approval criteria so that PCWs providing broadband comparisons give details of any data usage limits on the results page. Do you agree with these proposals and our analysis of their impact? Please give reasons and alternatives where appropriate.](#)

We agree with this proposal, and think it should be extended to mobile broadband, in particular 4G, where data usage caps can be exhausted quickly. Any consequences of exceeding data caps should be made clear (e.g. automatic additional charges, customer agreeing to additional charge, traffic management).

[Q6 Ofcom is proposing that the approval criteria are amended to include a requirement on PCWs to provide information about traffic management policies. Do you agree with this proposal and our assessment of its impact? Please give reasons and alternatives, where appropriate.](#)

We fully support this proposal. We think it is vital that consumers are aware of traffic management policies. However we think it is equally important that consumers have a meaningful level of data, as opposed to just a crude 'traffic management flag'.

For consumers making buying (or switching decisions) for broadband, knowing an individual CP's traffic management policies (and how any traffic management would be imposed) is a key feature of the product and how it will work. Key Facts Indicators (KFIs) must be easy to access, in particular via a link to a 3rd Party comparison site which interprets KFIs in a consumer-friendly way. There should also be links to CPs' own websites for consumers who want detailed information.

We believe this should apply to both fixed and mobile broadband, especially given that all major ISPs are signatories to the Traffic Management Transparency Code of Practice.

With reference to Question 5, consumers would also find it helpful to know an ISP's policies on traffic management if and when the customer approaches or exceeds any data cap.

Q7 Ofcom is proposing that the approval criteria are amended to include a requirement on PCWs to provide information and a link to Ofcom's comparative customer service and complaints information. Do you agree with this proposal and our assessment of its impact? Please give reasons and alternatives, where appropriate.

From the Consultation, none of Consumer Focus, the OFT, or the European Commission have identified this as an area that needs improvement. We believe it is important to differentiate between independently assessable and objective criteria such as price, speed and related metrics, and much more subjective matters such as complaints and service. Accordingly, we think it would be appropriate to omit this requirement at this time and to undertake some customer research in time for the next review of the scheme.

Q8 Ofcom invites views on our proposals to publish guidance on past decisions and to carry out quarterly spot-checks. Please indicate whether you agree with the proposals, giving reasons and alternatives where appropriate.

We agree with this proposal.

Q9 Ofcom is proposing to modify the charging schedule to the effect that companies or other entities with two full-time equivalent employees can benefit from the lower charges. Please indicate whether you agree with the proposals, giving reasons and alternatives where appropriate.

We are neutral on this proposal. We also think it is important that ownership of PCWs is made clear in order to avoid any potential conflict of interest. BT's agrees with Consumer Focus' views that PCWs show prices which are up-to-date (and that any price changes by CPs are incorporated promptly).

Q10 Ofcom invites views on any additional publicity that Ofcom should be giving to the Scheme and accredited PCWs and on any changes to the Scheme logo we should consider.

We have no specific views on this.

Q11 Ofcom is proposing to require accredited PCWs to have a complaints handling process in place, which shall be clearly set out on their websites. Please indicate whether you agree with the proposals, giving reasons and alternatives where appropriate.

We agree with this proposal. There should also be a mechanism in place for CPs to complain to PCWs should there be inaccuracies.

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